

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)
) Case No. 1:20-CR-143
 v.)
) Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,)
)
)
Defendant.)
)

**GOVERNMENT'S MOTION TO SEAL RESPONSE TO DEFENDANT'S MOTION TO
FILE REDACTED VERSIONS OF TRANSCRIPTS AND
EXHIBITS ON THE PUBLIC DOCKET**

The United States of America, by and through its undersigned counsel and pursuant to Local Criminal Rule 49(C) and 49(E), moves to file under seal exhibits 1 through 6 attached to the government's response to the defendant's motion to file redacted versions of transcripts and exhibits on the public docket. The government's response was filed on the docket as Dkt. No. 294. Under-seal copies of the exhibits will be delivered to the clerk's office with a copy of this motion and provided to defense counsel and chambers. A proposed Order is attached for the consideration of the Court.

Through the Protective Order [Dkt. No. 28], the parties have agreed that certain information related to this investigation and prosecution should be filed under seal. The exhibits attached to the government's response to the defendant's motion to file redacted versions of transcripts and exhibits on the public docket contain sensitive law enforcement information and details that, if revealed, could jeopardize this and other law enforcement investigations. Sealing the exhibits is therefore necessary in order to safeguard this information and protect these

investigations. The government has considered alternatives less drastic than sealing and has found that none will suffice.

The Court has supervisory power over its own records and may, in its discretion, seal documents if the public's right of access is outweighed by competing interests. *In re Knight Pub. Co.*, 743 F.2d 231, 235 (4th Cir. 1984). Such sealing is within the discretion of this Court and may be granted for "any legitimate prosecutorial need." *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see also, Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

Accordingly, the United States requests that exhibits 1 through 6 to the government's response to the defendant's motion to file redacted versions of transcripts and exhibits on the public docket be filed and remain under seal until further order of the Court.

Respectfully submitted,

Raj Parekh
Acting United States Attorney

By: _____/s/
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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/
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